

FILED

JUN 20 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUISUNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HOMER TOWNSLEY, JR.,

Defendant.

4:19CR474 AGF/PLC

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Special Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with Felon in Possession of a Firearm in violation of 18 U.S.C. § 922(g)(1), an offense for which a maximum 10-year imprisonment is prescribed under Title 18.

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. According to St. Louis County Police Department Investigative Report 19-19422, police were called to a home at 3927 Trotwood Place, for a domestic violence incident. The defendant's wife reported that the defendant was high on crack cocaine and threatened to shoot her in the head. When police made contact with the defendant, they asked permission to search him for weapons and he advised he had a gun in his jacket. Police located a loaded .32 caliber revolver. Throughout their interaction with the defendant at his residence, he used profanity when referring to his wife. During a recorded interview at the police department, the defendant admitted to being a convicted felon and indicated he has purchased several

firearms over the years, having bought them at gun shows in an effort to avoid background checks. Following said admissions, police asked the defendant's wife for consent to search the residence in an effort to locate additional firearms. Said search revealed two (2) additional revolvers, multiple boxes and crates of ammunition, and four (4) loaded pistol magazines.

4. The defendant has felony convictions for two (2) counts of Felon in Possession of a Firearm in the United States District Court of Eastern Missouri (84-00218CR) and Stealing of a Motor Vehicle in the City of St. Louis (22871-03385A). The defendant has misdemeanor convictions for Intentional Inhale of a Solvent (23CR3024413) and Driving While Intoxicated (08JE-CR04809).

5. The defendant has multiple arrests for domestic assault and violations of orders of protections.

6. The defendant's criminal history and the nature and circumstances of the offense charged, particularly the fact that he threatened to shoot his wife in the head, reflects that there is a serious danger to the community that would be posed by the defendant's release.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Jennifer Szczucinski
JENNIFER SZCZUCINSKI, #56906MO
Special Assistant United States Attorney